

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*
PEDRO JOSE ORTIZ VIERA	* CASE NO. 12-09854 BKT
CARMEN VALDES DEL VALLE	*
Debtor(s)	CHAPTER 13
-----	*
BANCO POPULAR de PUERTO RICO	INDEX
Movant	*
PDERO JOSE ORTIZ VIERA	*
CARMEN VALDES DEL VALLE	*
Respondent (s)	*

DEBTORS' RESPONSE TO *MOTION FOR RELIEF OF AUTOMATIC STAY*
DOCKET NO. 36

TO THE HONORABLE COURT:

NOW COME, PEDRO JOSE ORTIZ VIERA and CARMEN VALDES DEL VALLE,
debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. On October 15, 2015, Banco Popular de Puerto Rico ("BPPR"), filed a motion for relief of automatic stay in the present bankruptcy case, docket no. 36, basically alleging that the debtors are in post-petition arrears (three months) in the mortgage loan payments to said creditor.

2. The debtors respectfully allege that they have been making current post-petition mortgage loan payments to BPPR. The debtors have recently made the following payments:

---June 12, 2015, \$232.00 to cover the June, 2015 mortgage payment;

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Debtors' Response to §362 Motion
Case no. 12-09854 BKT13

---July 29, 2015, \$232.00 to cover the July, 2015 mortgage payment;
---August 14, 2015, \$232.00 to cover the August, 2015 mortgage payment;
---October 16, 2015, \$232.00 to cover the September, 2015 mortgage payment;
---October 28, 2015, \$232.00 to cover the October, 2015 mortgage payment.

3. The debtors respectfully understand that they are up-to-date in their mortgage loan payments to BPPR. Attached is copy of receipts issued by BPPR to evidence all the aforementioned mortgage loan payments made by the debtors to BPPR. Thus, there is no "cause" to lift the stay, in the above captioned case.

4. Notwithstanding, **the debtors hereby consent** to the lifting of the automatic stay in favor of BPPR in order to meet with BPPR and deal with this matter outside the Bankruptcy Court. There are no pre-petition arrears paid to BPPR through the confirmed Plan, in the above captioned case.

WHEREFORE, debtors respectfully request from this Honorable Court to grant the present motion consenting to BPPR's request for the lift of stay in the above captioned Index.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; Carlos G Batista Jimenez, Esq., Counsel for BPPR; I also certify that a copy of this motion was sent via regular mail to the debtors/respondents Pedro Jose Ortiz Viera and Carmen Valdes Del Valle, Alturas de Hato

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Debtors' Response to §362 Motion
Case no. 12-09854 BKT13

Nuevo 330 Gurabo PR 00778.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of October,
2015.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR DEBTOR/RESPONDENT
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX NO 787-746-5294
Email: rfigueroa@rfclawpr.com



044 Suc. Gurabo
Date: 10/28/2015 Time: 1:36 pm
Teller ID: 15

Trans. / Sequence	Trans. Description / Account Number	Amount
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350	Cash From Client	\$240.00
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MORT. BILLING PROVO14 Payment		
0700398597		\$232.00
Paid Amount		

351	Paid To Client	\$8.00
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Este recibo es el comprobante de sus transacciones. Consérvelo para reconciliar su estado de cuenta, para alguna reclamación o devoluciones de Especiales Musicales.
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044 Suc. Gurabo
Date: 08/14/2015 Time: 10:16 am
Teller ID: 15

Trans. / Sequence	Trans. Description / Account Number	Amount
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780	Cash From Client	\$240.00
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	MORT.BILLING PROV014 Payment 0700398597 Paid Amount	\$232.00
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	Paid To Client	\$8.00
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transacciones. Consérvelo para reconciliar su
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044 Suc. Gurabo
Date: 10/16/2015 Time: 2:59 pm
Teller ID: 13

Trans. / Sequence	Trans. Description / Account Number	Amount
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617	Cash From Client	\$265.00
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	MORT.BILLING PROV014 Payment 0700398597 Paid Amount	\$232.00
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618	MORT.BILLING PROV752 Payment 0700398597 Paid Amount	\$30.96
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519	Paid To Client	\$2.04
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044 Suc. Gurabo
 Date: 06/12/2015 Time: 3:33 pm
 Teller ID: 16

Trans. / Sequence	Trans. Description / Account Number	Amount
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380	Cash From Client	\$240.00
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	MORT.BILLING PROV014 Payment 0700398597 Paid Amount	\$232.00
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	Cash Paid To Client	\$8.00
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 transacciones. Consérvelo para reconciliar su
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BANCO POPULAR

044 Suc. Gurabo
 Date: 07/29/2015 Time: 12:45 pm
 Teller ID: 15

Trans. / Sequence	Trans. Description / Account Number	Amount
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380	Cash From Client	\$240.00
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	MORT.BILLING PROV014 Payment 0700398597 Paid Amount	\$232.00
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381	Cash From Client	\$160.15
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	AEE Payment 00032748710009 Paid Amount	\$152.11
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382	Paid To Client	\$16.04
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Este recibo es el comprobante de sus
 transacciones. Consérvelo para reconciliar su
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